

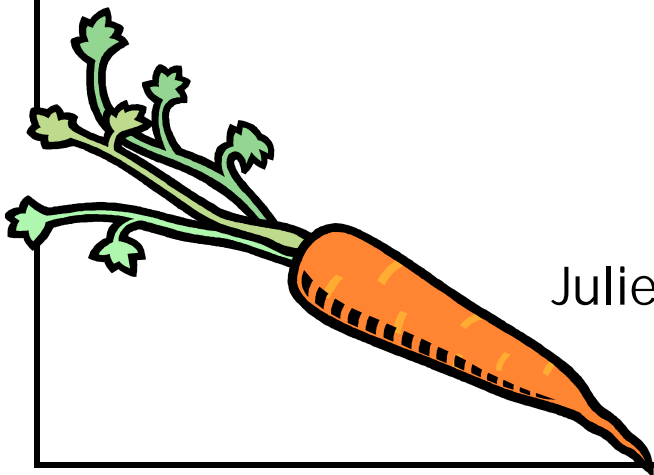
# Nutrition Analysis, Labeling & Marketing

Understanding the Nutrition Facts Label



**on the menu**

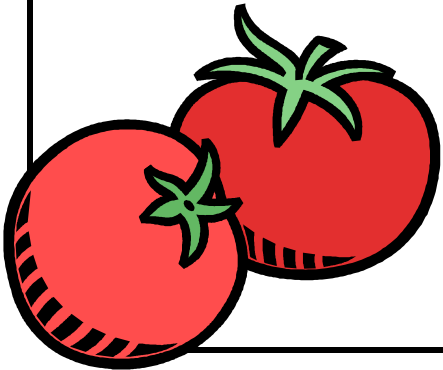
nutrition consultants  
to the food industry



Julie Bush & Rebekah Spetnagel

# What we do at On The Menu, LLC

- Recipe analysis
- Nutrition Facts panels
- Nutrient content claims
- Ingredient statements
- Allergen and gluten identification
- Restaurant menu analysis
- Nutrition marketing

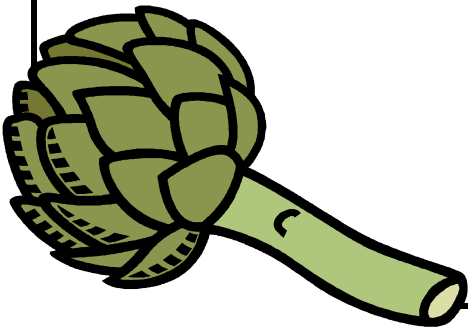


# Where do food labeling laws come from?

1938 – Federal Food, Drug & Cosmetic Act (FFD&C)

Foods must be:

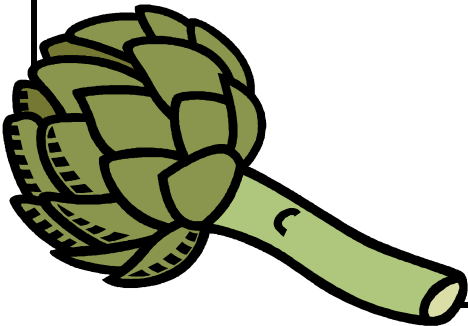
- Safe
- Clean
- Wholesome
- Processed and stored under sanitary conditions
- Truthfully labeled



# Where do food labeling laws come from?

1967 – Fair Packaging & Labeling Act (FPLA)

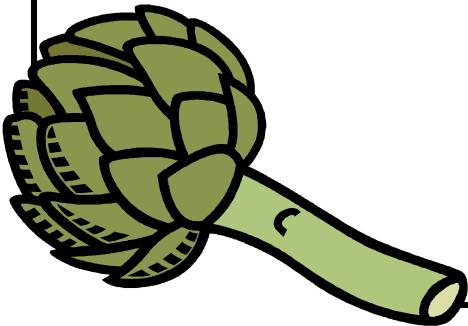
- Label informs consumer so value comparison can be made
- Requirements for net quantity, type size and location of specific information
- Applies only for retail purchase



# Where do food labeling laws come from?

1990 – Nutrition Labeling & Education Act (NLEA)

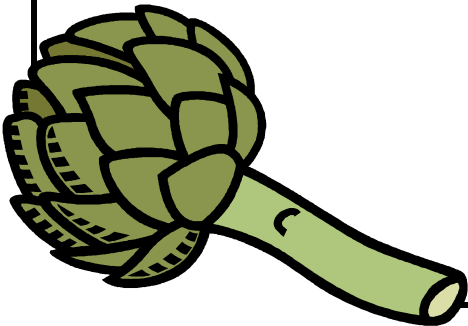
- Nutrition Facts panel format
- Helps consumers make healthy food choices
- Mandatory nutrition for most foods
- Regulates nutrition content and health claims
- Makes food labeling more uniform



# Where do food labeling laws come from?

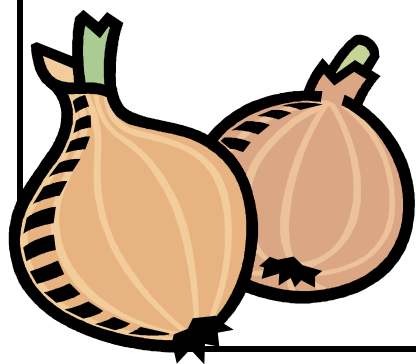
2006 – Food Allergen Labeling and Consumer Protection Act (FALCPA)

- Requires label to disclose eight major allergens



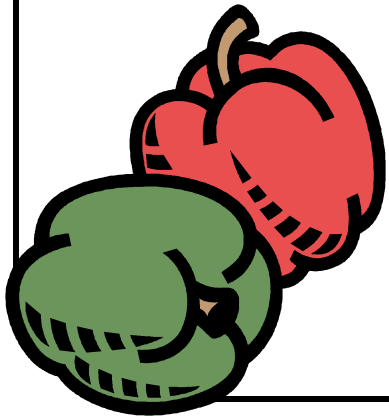
# The Code of Federal Regulations

- Title 21: Food and Drugs
  - Most food regulations in 21 CFR 100-169
- Published yearly
- Free online through:
  - <http://www.gpo.gov>
  - <http://www.fda.gov>



# USDA vs. FDA

- USDA (meat and poultry)
  - 3% meat or more
  - 2% poultry or more
- FDA (all other foods)
- FDA and USDA have comparable authority but divergent approaches
  - USDA pre-approval process
  - FDA relies on detailed regulations and market place surveillance

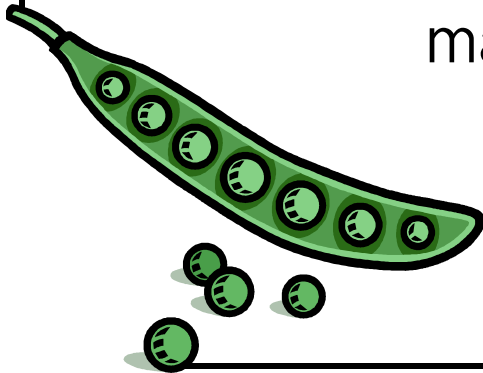




# FFD&C Act and FPLA

Big Six Requirements:

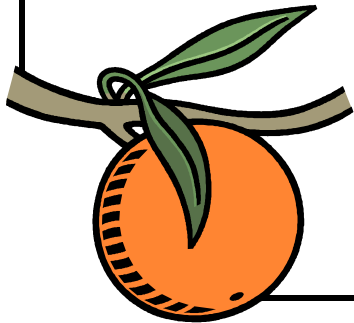
- Statement of identity
- Net quantity of contents
- Nutrition labeling
- Ingredient statement
- Allergen declaration
- Name and place of business of manufacturer, packer or distributor



# Statement of Identity

- Name specified by law or regulations
- Common or usual name
- Appropriately descriptive name or fanciful term

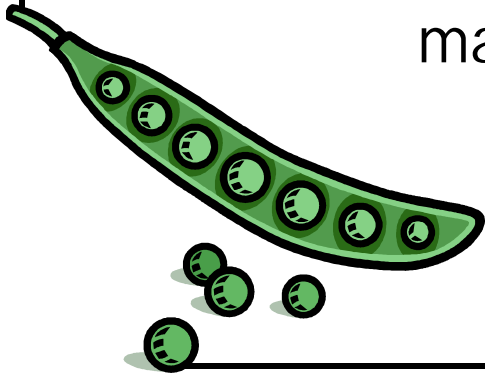
(21 CFR 130-169 and 21 CFR 102)



# FFD&C Act and FPLA

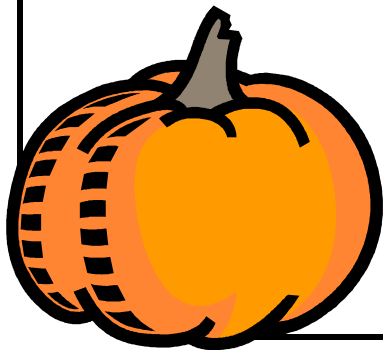
Big Six Requirements:

- Statement of identity
- Net quantity of contents
- Nutrition labeling
- Ingredient statement
- Allergen declaration
- Name and place of business of manufacturer, packer or distributor



# Net Quantity of Contents

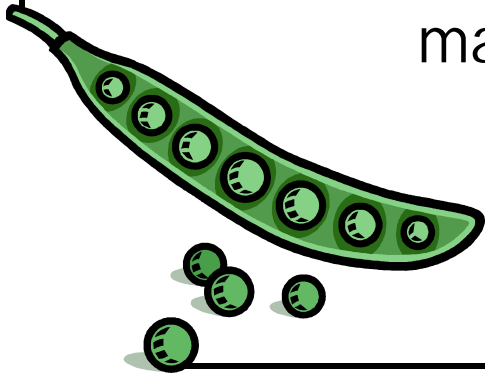
- Must show in both metric (grams, kilograms, milliliters, liters) and U.S. Customary System (ounces, pounds, fluid ounces) terms
  - Net Wt 1 lb 4 oz (567 g)
  - Net 8 fl oz (237 mL)



# FFD&C Act and FPLA

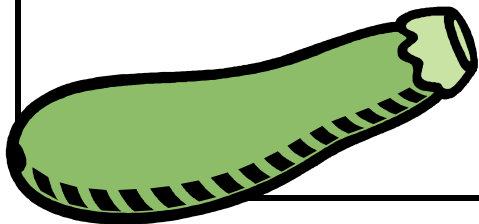
Big Six Requirements:

- Statement of identity
- Net quantity of contents
- Nutrition labeling
- Ingredient statement
- Allergen declaration
- Name and place of business of manufacturer, packer or distributor



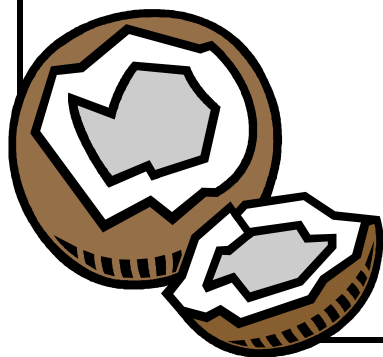
# Nutrition Labeling Exemptions

- Small business
- Bulk food for further manufacturing
- Restaurant and food service foods
- Food sold or served for immediate consumption
- Foods with insignificant amounts of nutrients
- Infant formulas
- Dietary supplements
- Medical foods



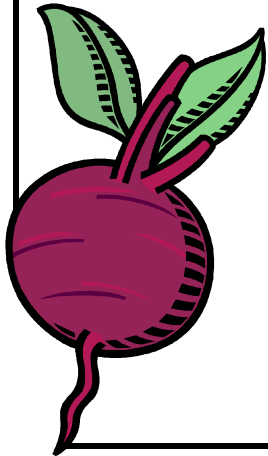
# Small Business Exemption Criteria

- Low volume food products
  - <100 employees and <100,000 units
    - Required to submit exempt form to FDA*
  - <10 employees and <10,000 units
    - Exempt form to FDA is optional*
- No nutrition claims or statements made



# Benefits of Nutrition Labeling

- Gives insight into nutrition profile of product
- Majority of consumers want to know
- Allows you to make claims
- Competitive edge
- Ability to market your food product

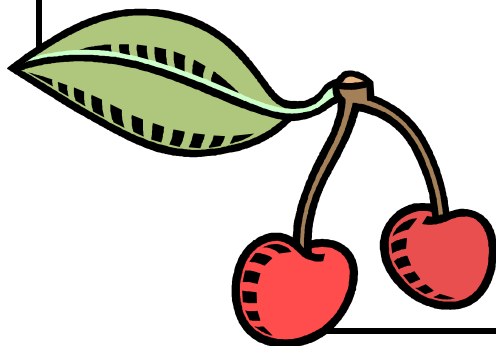




# The International Food Information Council

2007 Food and Health Survey reports:

*"Two-thirds of consumers check the Nutrition Facts panel when deciding whether to purchase a product."*



# Nutrition Facts Panel

Three major sections:

- Serving size
- Nutrient values
- Footnote



## Nutrition Facts

Serving Size 2 Tbsp (28g)  
Servings Per Container 16

Amount Per Serving

**Calories** 30      **Calories from Fat** 0

% Daily Value\*

**Total Fat** 0g      **0%**

Saturated Fat 0g      **0%**

Trans Fat 0g

**Cholesterol** 0mg      **0%**

**Sodium** 170mg      **7%**

**Total Carbohydrate** 8g      **3%**

Dietary Fiber 0g      **0%**

Sugars 7g

**Protein** 0g

Vitamin A 0%      • Vitamin C 0%

Calcium 2%      • Iron 2%

\*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories	2,000	2,500
Total Fat	Less Than	65g	80g
Saturated Fat	Less Than	20g	25g
Cholesterol	Less Than	300mg	300 mg
Sodium	Less Than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

Calories per gram:

Fat 9 • Carbohydrate 4 • Protein 4

# Serving Size

- Based on Reference Amounts
- In household measures

*(21 CFR 101.12)*



# Mandatory Nutrients

- Calories
- Calories from fat
- Total fat
- Saturated fat
- *Trans* fat
- Cholesterol
- Sodium
- Total carbohydrate
- Dietary fiber
- Sugars
- Protein
- Vitamin A
- Vitamin C
- Calcium
- Iron



# Footnote

- All labels must have *"Percent Daily Values are based on a 2,000 calorie diet."*
- Remaining information in the full footnote may be left off if the package is small.
- Daily values on footnote remain the same for each nutrient and are based on public health experts' advice.



# Label Formats

- Standard
- Tabular
- Dual Declaration
- Aggregate
- Simplified
- Other



# Standard



## Nutrition Facts

Serving Size 2 Tbsp (28g)  
Servings Per Container 16

Amount Per Serving

**Calories 30**      **Calories from Fat 0**

% Daily Value\*

**Total Fat 0g**      **0%**

Saturated Fat 0g      **0%**

Trans Fat 0g

**Cholesterol 0mg**      **0%**

**Sodium 170mg**      **7%**

**Total Carbohydrate 8g**      **3%**

Dietary Fiber 0g      **0%**

Sugars 7g

**Protein 0g**

Vitamin A 0%      • Vitamin C 0%

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Cholesterol	Less Than	300mg	300 mg	
Sodium	Less Than	2,400mg	2,400mg	
Total Carbohydrate		300g	375g	
Dietary Fiber		25g	30g	

Calories per gram:

Fat 9 • Carbohydrate 4 • Protein 4

# Tabular

## Nutrition Facts

Serving Size 2 Tbsp (28g)  
Servings Per Container 16  
**Calories** 30  
Calories from Fat 0

Amount / Serving	% Daily Value*	Amount / Serving	% Daily Value*
<b>Total Fat</b> 0g	<b>0%</b>	<b>Total Carbohydrate</b> 8g	<b>3%</b>
Saturated Fat 0g	0%	Dietary Fiber 0g	0%
Trans Fat 0g		Sugars 7g	
<b>Cholesterol</b> 0mg	<b>0%</b>	<b>Protein</b> 0g	
<b>Sodium</b> 170mg	<b>7%</b>		
Vitamin A 0% • Vitamin C 0%		Calcium 2% • Iron 2%	

\*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories	2,000	2,500
Total Fat	Less Than	65g	80g
Saturated Fat	Less Than	20g	25g
Cholesterol	Less Than	300mg	300 mg
Sodium	Less Than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

Calories per gram:  
Fat 9 • Carbohydrate 4 • Protein 4





# Dual Declaration



## Nutrition Facts

Serving Size 1/2 cup (55g)  
Servings Per Container 15

Amount Per Serving	Granola with 1/2 Cup Fat	Granola Free Milk
<b>Calories</b>	230	290
Calories from Fat	100	70
	% Daily Value**	
<b>Total Fat 11g*</b>	<b>17%</b>	<b>12%</b>
Saturated Fat 2g	10%	3%
Trans Fat 0g		
<b>Cholesterol 0mg</b>	<b>0%</b>	<b>0%</b>
<b>Sodium 90mg</b>	<b>4%</b>	<b>7%</b>
<b>Total Carbohydrate 31g</b>	<b>10%</b>	<b>15%</b>
Dietary Fiber 3g	12%	16%
Sugars 17g		
<b>Protein 4g</b>		
Vitamin A	0%	6%
Vitamin C	0%	2%
Calcium	4%	15%
Iron	8%	10%

\*Amount in Granola. Granola with 1/2 Cup Fat Free Milk contributes an additional 60 Calories, 70 mg Sodium, 13 g Total Carbohydrate (1 g Dietary Fiber, 7 g Sugars), 6 g Protein.

\*\*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

		Calories	2,000	2,500
Total Fat	Less Than	65g	80g	
Saturated Fat	Less Than	20g	25g	
Cholesterol	Less Than	300mg	300 mg	
Sodium	Less Than	2,400mg	2,400mg	
Total Carbohydrate		300g	375g	
Dietary Fiber		25g	30g	

Calories per gram:

Fat 9 • Carbohydrate 4 • Protein 4

# Aggregate

## Nutrition Facts

Nutrition Facts			Plain Granola		Almond-Raisin Granola		Pecan-Cranberry Granola	
Serving Size			1/2 cup (57g)		1/2 cup (57g)		1/2 cup (57g)	
Servings Per Container			15		15		15	
Amount Per Serving								
Calories			230		240		250	
Calories from Fat			100		70		120	
			% Daily Value*		% Daily Value*		% Daily Value*	
Total Fat			11g	17%	8g	12%	13g	20%
Saturated Fat			2.5g	13%	0.5g	3%	2.5g	13%
Trans Fat			0g		0g		0g	
Cholesterol			0mg	0%	0mg	0%	0mg	0%
Sodium			130mg	5%	90mg	4%	95mg	4%
Total Carbohydrate			32g	11%	37g	12%	31g	10%
Dietary Fiber			3g	12%	4g	16%	3g	12%
Sugars			16g		18g		17g	
Protein			4g		5g		4g	
*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:			Vitamin A		0%		0%	
			Vitamin C		0%		0%	
			Calcium		4%		4%	
			Iron		10%		8%	
Calories			2,000	2,500				
Total Fat	Less Than	65g	80g					
Saturated Fat	Less Than	20g	25g					
Cholesterol	Less Than	300mg	300 mg					
Sodium	Less Than	2,400mg	2,400mg					
Total Carbohydrate		300g	375g					
Dietary Fiber		25g	30g					
Calories per gram:								
Fat 9 • Carbohydrate 4 • Protein 4								



# Simplified

- Seven or more nutrients are present in “insignificant amounts”



## Nutrition Facts

Serving Size 1 oz.  
Servings Per Container 10

Amount Per Serving

**Calories** 10      **Calories from Fat** 0

% Daily Value\*

**Total Fat** 0g      **0%**

Saturated Fat 0g      **0%**

Trans Fat 0g

**Cholesterol** 0mg      **0%**

**Sodium** 0mg      **0%**

**Total Carbohydrate** 3g      **1%**

Dietary Fiber 0g      **0%**

Sugars 1g

**Protein** 0g

Vitamin A 0%      • Vitamin C 4%

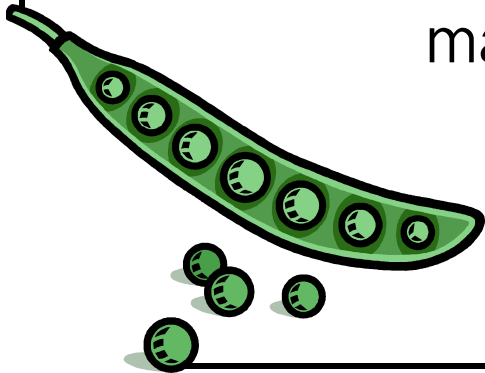
Calcium 0%      • Iron 0%

\*Percent Daily Values are based on a 2,000 calorie diet.

# FFD&C Act and FPLA

Big Six Requirements:

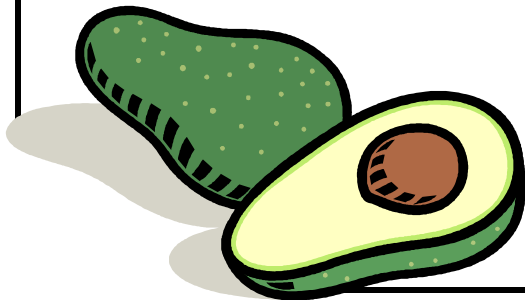
- Statement of identity
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- Nutrition labeling
- Ingredient statement
- Allergen declaration
- Name and place of business of manufacturer, packer or distributor



# Ingredient Statement

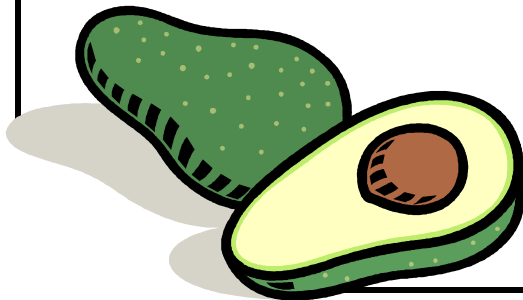
- All ingredients used to fabricate a food must be listed in the ingredient statement by their common or usual name
- Except, if covered by an exemption

(21 CFR 101.4)



# Ingredient Labeling Requirements

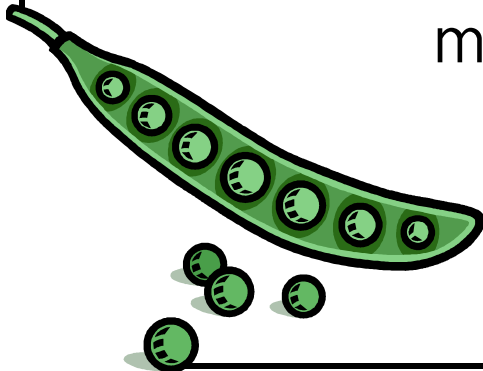
- Ingredients must be listed in descending order of predominance by weight
- Ingredients must be listed by common or usual name
- Multi-component ingredients must list ingredients in parenthesis
- Special rules apply to spices, flavorings and colorings



# FFD&C Act and FPLA

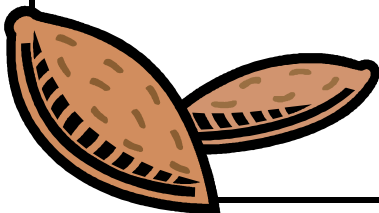
Big Six Requirements:

- Statement of identity
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- Name and place of business of manufacturer, packer or distributor



# Eight Major Food Allergens

- Milk
- Egg
- Wheat
- Fish (e.g., bass, flounder, cod)
- Crustaceans (e.g. crab, shrimp)
- Soy
- Peanuts
- Tree Nuts (e.g., almonds, pecans, walnuts)

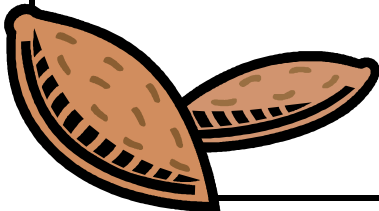




# Fish, Crustaceans and Nuts

In the case of a tree nut, fish or Crustacean shellfish, use the name of the specific type of nut or species of fish or shellfish.

Correct	Incorrect
"Contains Almonds"	"Contains Tree Nuts"
"Contains Tuna"	"Contains Fish"
Contains Shrimp"	"Contains Crustacean"



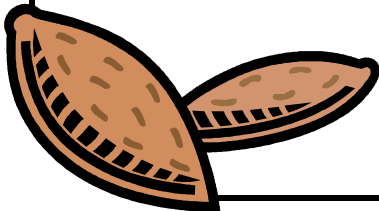
# Acceptable Allergen Declarations

- Ingredient statement

INGREDIENTS: Oats, Raisins, Maple Syrup, Brown Sugar, Almonds, Sunflower Oil, Wheat Bran, Water, Salt.

- “Contains” statement

Contains Wheat and Almonds.



# Allergen Labeling

- Questionable

INGREDIENTS: LIQUID CORN OIL, PARTIALLY HYDROGENATED SOYBEAN OIL, WHEY, SALT VEGETABLE MONO- AND DIGLCLERIDES AND SOY LECITHIN...

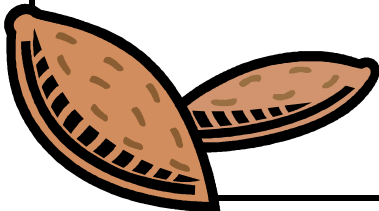
CONTAINS: MILK

- Recognizable

INGREDIENTS: LIQUID CORN OIL, PARTIALLY HYDROGENATED SOYBEAN OIL, WHEY (MILK), SALT VEGETABLE MONO- AND DIGLCLERIDES AND SOY LECITHIN...

**Or...**

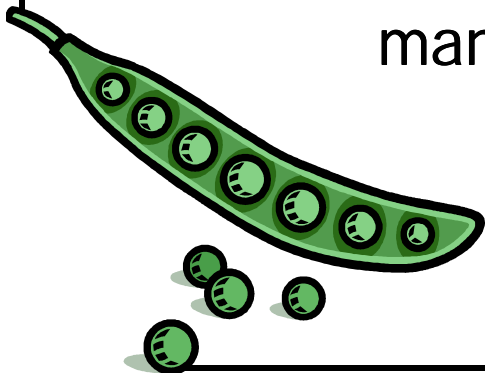
CONTAINS: MILK AND SOY



# FFD&C Act and FPLA

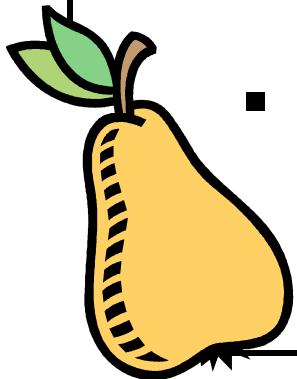
Big Six Requirements:

- Statement of identity
- Net quantity of contents
- Nutrition labeling
- Ingredient statement
- Allergen declaration
- Name and place of business of manufacturer, packer or distributor



# Name and place of business

- Must appear with nutrition/ingredient labeling
- Must include:
  - Name of manufacturer, packer or distributor
  - Street address (if not in current directory)
  - City
  - State
  - Zip Code
- Telephone and website optional



(21 CFR 101.5)

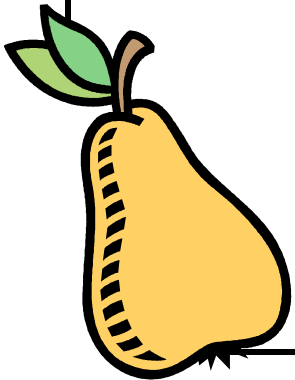
# Name and place of business

- Principal place of business may be listed if the food is manufactured at a site other than the principal place of business
- Terms that may be used if the food is not manufactured by the company named on the label:

*"Manufactured for"*

*"Distributed by"*

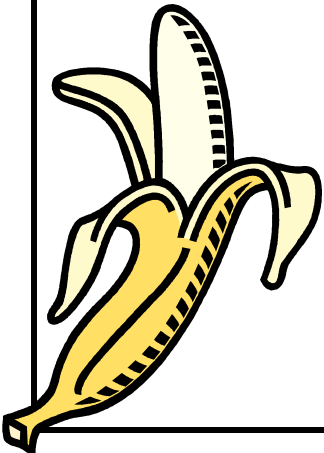
*"Imported by"*



# Use Claims to Market Your Food

- Nutrient Content Claims
- Health Claims
- Other Claims

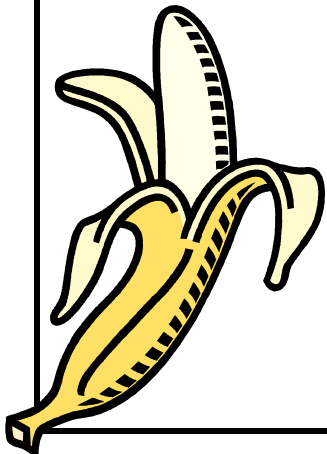
*Nutrition Facts label is required when making claims.*



# Nutrient Content Claims

- Claim about the level of a nutrient in a food based on Reference Amount

21 CFR 101.13; 21 CFR 101.54 - 101.67

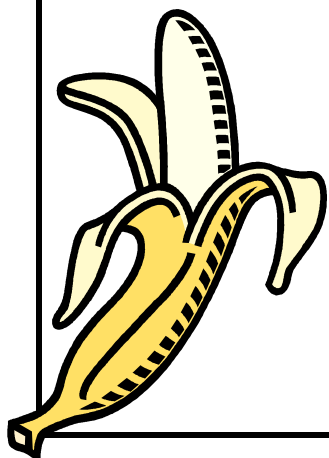




# Example of a Nutrient Content Claim

High Fiber

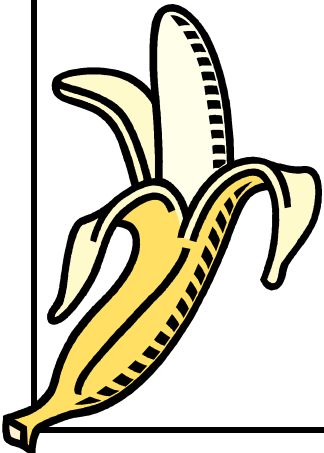
Based on FDA Reference Amount (RA) food must contain 20 percent or more of the Daily Value. If the food is not "low fat," you must declare the fat content per serving.



# Health Claims

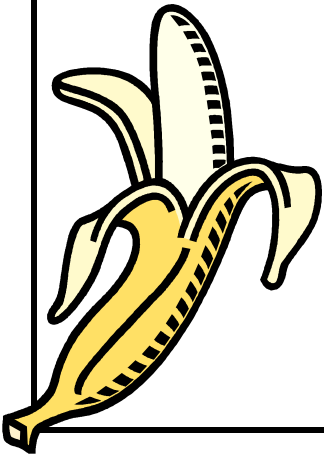
Describes relationship between diet and health:

- How a nutrient affects a disease or health-related condition
- How a nutrient affects normal structure or function in humans



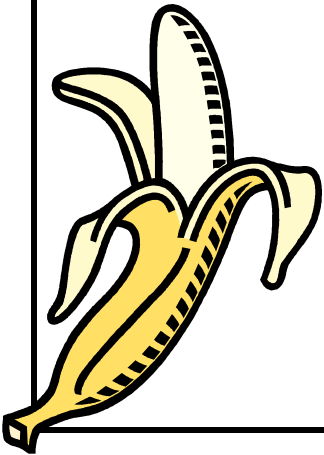
# Example of a Health Claim

*"Diets low in sodium may reduce the risk of high blood pressure, a disease associated with many factors"*

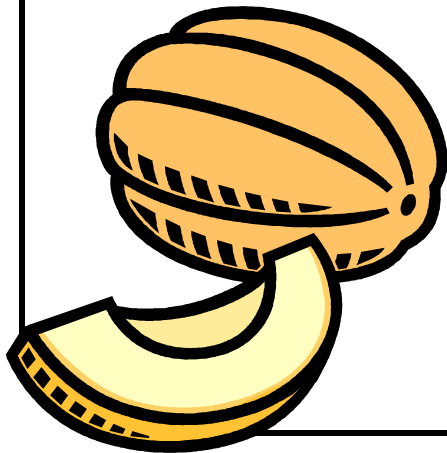


# Other Claims

- Comparative  
*"30% less fat than regular potato chips"*
- Implied  
*"High in oat bran"*



# Questions?





**on the menu**

nutrition consultants  
to the food industry

Rebekah Spetnagel & Julie Bush

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